

May 16, 2016

Margaret M. Fox

pfox@mcnair.net
T 803.799.9800
F 803.753.3278

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Application of Mobilitie Management, LLC for a Certificate of Public
Convenience and Necessity to Provide Facilities Based and Resold
Local Exchange Service and for Flexible Regulation of Its Local
Exchange Services
Docket No. 2016-176-C

Dear Ms. Boyd:

Please find enclosed for filing on behalf of the South Carolina Telephone
Coalition (the "Coalition"), a Petition to Intervene in the above-referenced
docket. By copy of this letter and Certificate of Service all parties of record will
receive a copy of this Petition to Intervene via the U. S. Postal Service.

Thank you for your assistance.

Very truly yours,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

Enclosure

McNAIR LAW FIRM, P.A.
1221 Main Street
Suite 1600
Columbia, SC 29201

Mailing Address
Post Office Box 11390
Columbia, SC 29211

mcnair.net

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2016-176-C

Re: Application of Mobilitie Management,)	
LLC for a Certificate of Public)	
Convenience and Necessity to Provide)	PETITION TO INTERVENE
Facilities Based and Resold Local)	
Exchange Service and for Flexible)	
Regulation of Its Local Exchange Services)	
<hr/>		

In response to the Commission's Notice of Filing of the Application of Mobilitie Management, LLC for a Certificate of Public Convenience and Necessity to Provide Facilities Based and Resold Local Exchange Service and for Flexible Regulation of Its Local Exchange Services in the State of South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.

2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.

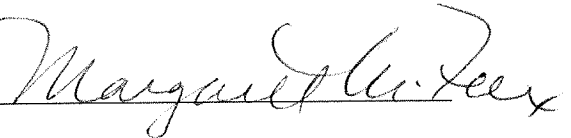
3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800
jbowen@mcnair.net
pfox@mcnair.net

By: 

Attorneys for Intervenor South Carolina
Telephone Coalition

May 16, 2016

Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2016-176-C

Re: Application of Mobilitie Management,)
LLC for a Certificate of Public)
Convenience and Necessity to Provide)
Facilities Based and Resold Local)
Exchange Service and for Flexible)
Regulation of Its Local Exchange Services)
_____)

CERTIFICATE OF SERVICE

I, Margaret M. Fox, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following parties of record by causing said copies to be deposited in the United States Mail, First Class, postage prepaid to:

John J. Pringle, Jr., Esquire
Adams and Reese, LLP
1501 Main Street, 5th Floor
Columbia, SC 29201

Counsel for Applicant Mobilitie
Management, LLC

Andrew M. Bateman, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201



Margaret M. Fox
McNair Law Firm, P. A.
Post Office Box 11390
Columbia, South Carolina 29211

May 16, 2016
Columbia, South Carolina